Susanne Guyer Executive Director Federal Regulatory Policy Issues RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

October 6, 1994

Ex Parte

Mr. William F. Caton Acting Secretary Federal Communications Commission Room 222 1919 M Street, NW Washington, DC 2006KET FILE COPY ORIGINAL

> CC Docket No. 92-77 Billed Party Preference RE:

Dear Mr. Caton:

Today, Messrs. A. Rivera, A. Novell, F. Murphy and I, representing NYNEX, met with Mr. M. Nadel of the Policy and Program Planning Division of the Common Carrier Bureau. The purpose of the meeting was to discuss NYNEX's position in the above-captioned proceeding. The NYNEX representatives explained the "dial around" study conducted in New York State that showed that 66% of all operator service type calls from pay phones were "dial around" calls. The NYNEX representatives also discussed the importance of determining an appropriate cost recovery method and including the costs of implementing such a method into the overall cost benefit analysis for Billed Party Preference.

The attached handouts were used during the discussion.

Sincerely,

cc: M. Nadel

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NYNEX Recycles

DIAL-AROUND STUDY

- CATEGORIZED BY AREA CODE AND INDUSTRY GROUP
- **BASED ON RANDOM SAMPLE**
- FOR NEW YORK STATE AREA

RESULTS SHOW THAT 66% OF ALL OPERATOR SERVICE TYPE CALLS WERE DIAL-AROUNDS

ATTACHMENT 1 INDUSTRY COSTS FOR IMPLEMENTATION BPP

(\$ in Millions) **NON - RECURRING COSTS RECURRING COSTS** TOTAL TOTAL PROCESS. OF INTERLATA 0+ RECURRING **0SS7 TO NON-RECURRING** LECS CHARGES END OFFICE 14 DIGIT SCREENING BASE CHARGES BASE CALLS FOR INDEPENDENTS 3.30 NYNEX 23.10 Est'd 120.40 3.80 3.30 **US West** 149.90 Est'd 3.80 27.80 Est'd Pacific Tel Est'd 26.10 Est'd 3.30 144.40 3.80

racinc lei	144.40		ESIU	3.00	!	20.10	LStu	3.30	
SWB	118.90			16.00		15.30	Est'd	3.30	
Ameritech	103.80		Est'd	3.80		35.20	Est'd	3.30	
BellSouth	100.00		Est'd	3.80		29.00		3.30	
Bell Atlantic	135.00			3.80		9.00	Est'd	3.30	
GTE	62.80	97.50		5.10		52.30	Est'd	3.30	
Sprint/United	54.70	217.70	Est'd)			3.50	Est'd		
Cincinnati	9.00		Est'd)	3.00		7.80	Est'd	3.00	
SNET	33.00		Est'd)			12.50	Est'd		
USTA	318.10					10.50			
	1,350.00	315.20		46.90	1,712.10	252.10		29.40	281.50
Adj for Inflation									
CPI = 3.1, 3.5, 3.6					1,892.70				
OSPs	 								
All OSPs from FNPRM	120.00		<u> </u>			I			
Initial Equal Access Process	250.00					l			
	370.00				370.00	 			
ADJ. for Inflation									
CPI = 3.1, 3.5, 3.6	409.00	_			409.00				
INDUSTRY COST					2,301.70				281.50

BENEFITS

	<u>FNPRM</u>	NYNEX COMMENTS	NYNEX REPLIES
THIRD TIER OSP DIFF.	\$280M	\$142.8M	\$142.8M
COMMISSIONS	\$340M	<u>\$92.6M</u>	<u>\$64.7M</u>
TOTAL	\$620M	\$235.4M	\$207.5M

COST RECOVERY FOR BILLED PARTY PREFERENCE

BPP COST RECOVERY METHOD MUST BE PART OF THE OVERALL ANALYSIS

ALTERNATIVES:

- 1. APPLY TO EUCL AND RECOVER FROM END USERS
- 2. APPLY VIA CHARGE TO ALL OPERATOR CALLS, INCLUDING 1-800 CALLS
- 3. BULK BILL BPP COSTS TO CARRIERS